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Attorneys for Defendants
MAGMA DESIGN AUTOMATION, INC. AND
RAJEEV MADHAVAN

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re

MAGMA DESIGN AUTOMATION,
INC. SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Case No. C-05-2394-CRB

CLASS ACTION

**STIPULATION AND ~~[PROPOSED]~~
ORDER EXTENDING DEFENDANTS'
TIME TO ANSWER AND RESETTING
CASE MANAGEMENT DEADLINES**

RECITALS

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2 1. **WHEREAS**, the parties agreed to continue the initial case management
3 conference and related dates until after such time as a consolidated complaint has been upheld by
4 the Court, and to submit a revised scheduling order within fourteen (14) days of that order, on
5 September 7, 2005;

6 2. **WHEREAS**, the Court signed the parties' stipulation on September 14, 2005;

7 3. **WHEREAS**, the Court granted in part and denied in part defendants' motion to
8 dismiss on August 18, 2006;

9 4. **WHEREAS**, defendants' answer to the first amended consolidated complaint is
10 currently due on September 1, 2006;

11 5. **WHEREAS**, Plaintiffs and Defendants have met and conferred regarding an
12 appropriate initial case management schedule;

STIPULATION OF THE PARTIES

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15 **THEREFOR**, the parties hereto, lead plaintiff Frank Weiler and defendants Magma
16 Design Automation, Inc. and Rajeev Madhavan, by and through their respective counsel of
17 record, hereby stipulate, agree, and request that the Court enter an order thereon, as follows:

18 1. Defendants shall file and serve the answer to the first amended consolidated
19 complaint on or before September 29, 2006;

20 2. The parties shall meet and confer regarding initial disclosures, early settlement,
21 and a discovery plan on or before September 18, 2006;

22 3. The last day to complete initial disclosures, file and serve a joint Case
23 Management Statement, and file and serve a Rule 26(f) Report shall be October 10, 2006; and
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1 4. The Initial Case Management Conference shall be held at 8:30 a.m. on Friday,
2 October 20, 2006.

3
4 Dated: August 28, 2006

DAVID M. FURBUSH
MEREDITH N. LANDY
DALE M. EDMONDSON
SARA M. FOLCHI
O'MELVENY & MYERS LLP

7
8 By: /s/ Dale M. Edmondson
9 Dale M. Edmondson

10 Attorneys for Defendants
11 MAGMA DESIGN AUTOMATION, INC. AND
12 RAJEEV MADHAVAN

13 Dated: August 28, 2006

JEFF S. WESTERMAN
KAREN T. ROGERS
CHERYL A. WILLIAMS
IAN CHOWDHURY
MILBERG WEISS BERSHAD &
SHULMAN LLP

17
18 By: /s/ Ian Chowdhury
19 Ian Chowdhury

20 Lead Counsel for Plaintiff

21 I, Dale M. Edmondson, am the ECF User whose ID and password are being used to file
22 this stipulation re-setting the hearing on class certification and extending the briefing schedule for
23 the same. In compliance with General Order 45, X.B., I hereby attest that Ian Chowdhury has
24 concurred in this filing.

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26 By: /s/ Dale M. Edmondson
27 Dale M. Edmondson

ORDER

The Court, having considered the recitals and stipulation of the parties, and good cause appearing therefor, **IT IS HEREBY ORDERED** as follows:

1. Defendants shall file and serve the answer to the first amended consolidated complaint on or before September 29, 2006;
2. The parties shall meet and confer regarding initial disclosures, early settlement, and a discovery plan on or before September 18, 2006;
3. The last day to complete initial disclosures, file and serve a joint Case Management Statement, and file and serve a Rule 26(f) Report shall be October 10, 2006; and
4. The Initial Case Management Conference shall be held at 8:30 a.m. on Friday, October 20, 2006.

DATED: August 29, 2006

Charles R. Breyer
United States District Court

